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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BERTRAM BROMBERG TRUST UAD 5/26/06,
ESTATE OF BERTRAM BROMBERG,
GLORIA BROMBERG TRUST UAD 5/26/06, and
GLORIA BROMBERG, individually and in her
capacities as settlor, beneficiary, and trustee of the
Gloria Bromberg Trust UAD 5/26/06, and in her

Adv. Pro. No. 10-05080 (SMB)

capacity as the successor trustee of the Bertram Bromberg Trust UAD 5/26/06, and in her capacity as Personal Representative of the Estate of Bertram Bromberg,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through their counsel, Baker & Hostetler LLP, and defendants (i) Bertram Bromberg Trust UAD 5/26/06, (ii) Gloria Bromberg Trust UAD 5/26/06, (iii) the Estate of Bertram Bromberg, and (iv) Gloria Bromberg, individually and in her capacities as settlor, beneficiary, and trustee of the Gloria Bromberg Trust UAD 5/26/06, and in her capacity as the successor trustee of the Bertram Bromberg Trust UAD 5/26/06, and in her capacity as Personal Representative of the the Estate of Bertram Bromberg (“Defendants”), by and through their counsel, Frejka, PLLC (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 2, 2010, the Trustee filed and served the Complaint against Defendants.
2. On April 17, 2014, Defendants served an answer on the Trustee.
3. Pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181], the Parties entered into a Settlement Agreement and Release on June 27, 2016.
4. Pursuant to the terms of the Settlement Agreement and Release, and in accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil

Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendants in the above-captioned adversary proceeding and dismissing the adversary proceeding.

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: July 25, 2016

New York, New York

Of Counsel:

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UAD 5/26/06, Gloria Bromberg Trust UAD
5/26/06, the Estate of Bertram Bromberg, and
Gloria Bromberg, individually and in her capacities
as settlor, beneficiary, and trustee of the Gloria
Bromberg Trust UAD 5/26/06, and in her capacity
as the successor trustee of the Bertram Bromberg
Trust UAD 5/26/06, and in her capacity as Personal
Representative of the the Estate of Bertram
Bromberg*

SO ORDERED

**Dated: July 26th, 2016
New York, New York**

/s/ STUART M. BERNSTEIN
**HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE**